

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,)	CASE NO. 23-CR-00471 WHO
)	
Plaintiff,)	
)	JUDGE SALLIE KIM
vs.)	
)	
KEITH LATTERI (2),)	<u>UNOPPOSED MOTION FOR LIMITED</u>
)	<u>MODIFICATION OF PRE-TRIAL</u>
Defendant.)	<u>RELEASE CONDITIONS</u>
)	

Now comes, Keith Latteri, by and through undersigned counsel, Friedman, Nemecek, Long & Grant, L.L.C., and hereby respectfully moves this Court for a limited modification of the conditions of his pre-trial release. Specifically, Mr. Latteri requests permission to visit his sister, Jennifer Winkowski, and other family members in Nutley, New Jersey, from July 25, 2025, until July 29, 2025. In support thereof, Mr. Latteri avers as follows:

1. An Indictment was filed against Mr. Latteri on December 12, 2023, alleging the following offenses, *to wit*: one (1) count of Intentional Damage to a Protected Computer in violation of 18 U.S.C. § 1030(a)(5)(A), (c)(4)(B)(i), and (c)(4)(A)(i)(I). (ECF #1-1).

2. An arraignment was held on May 9, 2024, at which time Mr. Latteri entered a plea of “Not Guilty” to the foregoing offense. (ECF #37). With the concurrence of the Government, the Court adopted and imposed the bond recommendations that had been set at Mr. Latteri’s initial appearance, which included conditions restricting Mr. Latteri’s travel to the Northern District of Ohio and Northern District of California. (ECF #13).

3. Mr. Latteri has abided by all terms and conditions imposed by this Honorable Court relative to his Pre-Trial release throughout the pendency of this matter. He has surrendered his passport, appeared at all required Court proceedings and maintained routine contact with both the undersigned and the Pretrial Services Office in the Northern District of Ohio. He also maintains gainful employment. Based upon his continued compliance with said conditions as well as his strong ties to the local community, there is no reason to believe that Mr. Latteri poses a danger to the community or a risk of absconding should this Honorable Court grant the modification herein requested.

4. As the Court is aware, Mr. Latteri is planning to relocate to New Jersey upon his release from federal prison. Before self-surrendering, he needs to move his personal belongings. Should the instant request be granted, Mr. Latteri will drive his personal belongings to New Jersey on July 25, 2025, and move them into storage. Thereafter, he will return to Ohio on July 29, 2025.

5. While in New Jersey, Mr. Latteri would stay with his sister, Jennifer Winkowski, at her home.¹ This is the same individual and location where Mr. Latteri has stayed during his previous visits to New Jersey.

6. The instant request has been discussed with United States District Court, Northern District of Ohio Pre-Trial Services Duty Officer Kaelyn Campbell, Medina County Probation Officer Aza Mycoskie, and Assistant United States Attorney Nikhil Bhagat, all of whom indicated that they have no objection to the modification herein requested.

¹ Additional information regarding the proposed travel arrangements, including Ms. Winkowski's address, can be provided upon request.

6. Mr. Latteri respectfully requests that the Court modify the Order setting conditions of pretrial release (ECF # 13) under 18 U.S.C. § 3142, by allowing him travel to Nutley, New Jersey on July 25, 2025, and return to Ohio on July 29, 2025, for the limited purpose of moving his personal belongings into storage and visiting with his sister.

WHEREFORE, the Defendant, Keith Latteri, hereby respectfully requests that the Court allow for the temporary modification of the Order setting the conditions of pre-trial release and permit him to travel to New Jersey from July 25, 2025, until July 29, 2025.

Respectfully submitted,

Dated: July 18, 2025

/s/ Eric C. Nemecek
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was filed by CM/ECF on the 18th day of July, 2025, which will send a notification of such filing electronically to the following: Nikhil Bhagat, Assistant United States Attorney for the Northern District of California.

Respectfully submitted,

/s/ Eric Nemecek

ERIC C. NEMECEK
Counsel for Defendant